

D. Webster
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Grenada Manufacturing, LLC

"A Global Leader in Metal Fabrication"

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Grenada, Ms 38901

RCRA PROGRAMS BRANCH
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April 10, 2002

Mr. Narindar M. Kumar
RCRA Programs Branch – Waste Management Division
US EPA Region IV
Atlanta Federal Center
61 Forsyth Street
Atlanta, Georgia 30303-8960

Re: Certification of Closure of RCRA SWMU 14 – Chromium Destruct Pit
Permit No.: HW-007-037-278
Grenada Manufacturing, LLC
Grenada, Mississippi

Dear Mr. Kumar:

Grenada Manufacturing, LLC. is pleased to provide this certification of closure for the above-referenced Chromium Destruct Pit (SWMU 14) located at the Grenada Manufacturing, LLC facility in Grenada, Mississippi. This certification is being provided in accordance with the requirements of MHWMR 264.115 for the owner/operator of the facility to provide certification of closure. I hereby certify that the closure activities were observed and that closure of the Chrome Destruct Pit was conducted in accordance with the specifications in the approved Revised Closure Plan, Chromium Destruct Pit, Grenada Manufacturing LLC, Version 2.1, Global Environmental Solutions, Inc., September, 2001.

Very truly yours,
Grenada Manufacturing, LLC.



Don Williams
Environmental, Health, and Safety Coordinator

Docket Number 450873

EPA Response to Comments: Grenada Manufacturing Revised Closure Plan, Chromium Destruct Pit August 2001

1. EPA's letter dated March 15, 2001, requested that the Closure Plan for the Chromium Destruct Pit follow 40 CFR Part 264 Subpart G requirements [Surface Impoundments]. The Closure plan that the facility sent August 20, 2001, presented as built drawings that show that the pit may be a partly below grade tank which should follow Subpart J requirements [Tanks]. The facility has stated that it intends to close the pit per 40 CFR Part 264.197(a) [Clean Closure]. EPA has reconsidered its former position based on the new information presented in the August 20, 2001, Closure Plan. However, if the facility cannot clean close the unit per 40 CFR Part 264.197(a); EPA will require that it close in accordance with 40 CFR Part 264.197(b) [Landfills]. EPA believes it is prudent to follow regulated unit closure guidelines for the Chromium Destruct Pit even though this is closure of a solid waste management unit.
2. The Final Closure Plan submitted to EPA and MDEQ should include a contingent plan for closure of the Chromium Destruct Pit as a landfill in case the facility is unable to clean close the unit. This will allow the facility to immediately proceed with the alternate plan and not delay final closure while the 'new' plan is developed, reviewed, and approved.
3. With regard to the sampling locations and procedures referenced on page 3 of the August 20, 2001 Closure Plan: EPA would like the soil borings to be made within five (5) feet, or a close, practicable distance to the walls of the Chromium Destruct Pit. Soil samples should be taken at the surface, and at five (5) foot intervals. The borings should be advanced to the deepest point above groundwater where a final sample is to be taken. Samples should be discrete and not composited. Total Chromium and Chromium VI should be analyzed in the laboratory; pH may be recorded in the field. If a stratigraphic difference or a change in soil appearance is encountered in the field, then a discrete sample should be taken at that point, in addition to the other samples. Please refer to EPA's Environmental Investigations Standard Operating Procedures and Quality Assurance Manual for procedural guidelines for sampling and analysis. The latest version of the manual can be found at: <http://www.epa.gov/region4/sesd/eisopqam/eisopqam.html>.
4. EPA would like the facility to consider adding three more sampling locations in the area of the Chromium Plating Baths. The first would be slightly west of Chrome Line 1, the second would be slightly east of Chrome Line 3 and the third would be north of SS-3 between Chrome Lines 2 & 3. EPA feels that this area should be fully characterized in the same manner as an Area of Concern either to rule it in or to rule it out for future remedial activities.